

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p>PLAINTIFF CHARLENE CARTER’S RULE 26(a)(2) DESIGNATION OF EXPERTS</p>
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Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Court’s November 4, 2021 Amended Scheduling Order (ECF 212, ¶6), Plaintiff Charlene Carter states that the following individuals may testify as expert witnesses in this matter, and further attaches their biographical information as Exhibit A:

I. Retained experts under Rule 26(a)(2)(B)

Identity	Report
<p>David E. Watkins Jason E. Winford Jenkins & Watkins, A Professional Corporation 4300 MacArthur Avenue, Suite 165 Dallas, Texas 75209 (214) 378-6675</p>	<p>Although it is not anticipated that they will testify at trial, Mr. Watkins and Mr. Winford are attorneys for Plaintiff and, as such, may testify if necessary in connection with a motion for attorney’s fees under Federal Rule of Civil Procedure 54(d)(2) regarding the reasonable and necessary attorneys’ fees incurred in litigating this case, the rates charged by each attorney and the reasonableness of such rates, the nature of the services rendered, and the expected attorneys’ fees for any appeals. They may also offer rebuttal testimony to any expert testimony regarding attorneys’ fees offered by Defendants. No written report is required under Fed. R. Civ. P. 26(a)(2)(B). Further, because litigation is</p>

	ongoing, the amount of attorneys' fees is not yet determinable.
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Dated: February 1, 2022

Respectfully submitted,

s/ Matthew B. Gilliam

Mathew B. Gilliam (*admitted pro hac vice*)

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s/ Jason E. Winford (*with permission*)

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Attorneys for Plaintiff Charlene Carter

Certificate of Service

I hereby certify that on February 1, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam